

# **Exhibit D**

**(House Defendants' April 30, 2022 Production Letter)**



**Michael A. Parente**  
Associate

April 30, 2022

**DELIVERED VIA EMAIL**

Christopher Bryant  
Boroughs Bryant LLC  
1122 Lady St. Ste. 208  
Columbia, SC 29201

*Re: S.C. State Conf. of the NAACP and Taiwan Scott v. Alexander, et al.,  
Docket No. 3:21-cv-03302-MBS-TJH-RMG (D.S.C.)  
House Defendants' Fifteenth Production*

Dear Chris:

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the "House Defendants"), we are producing a fifteenth set of documents to Plaintiffs. The production is being made pursuant to the Panel's April 13, 2022 Order (ECF No. 222) directing the production of communications such as personal email accounts and text messages. This production is made pursuant to the protest and reservations previously noted on the basis of legislative privilege.

As requested, this production is being sent via FTP to all counsel of record for Plaintiffs and the previously enumerated counsel for defendants. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 115 documents totaling 1,291 pages Bates labelled **SC\_HOUSE\_0109588 – SC\_HOUSE\_0110878**. There are 12 redactions made on the basis of non-responsiveness to Plaintiffs' Requests for Production.

Please let us know if you have any questions or concerns.

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Charleston  
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**Attorneys and Counselors at Law**

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Sincerely,

A handwritten signature in blue ink, appearing to read "M. Parente", with a long horizontal flourish extending to the right.

Michael A. Parente

cc: Counsel of Record